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*Attorneys for Defendant Attorney General Rob  
Bonta, in his official capacity*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

**X CORP.,**

Plaintiff,

**v.**

**ROBERT A. BONTA, ATTORNEY GENERAL  
OF CALIFORNIA, IN HIS OFFICIAL CAPACITY,**

Defendant.

2:23-CV-01939-WBS-AC

**STIPULATION TO EXTEND TIME FOR  
DEFENDANT TO RESPOND TO  
COMPLAINT**

Judge: Hon. William B. Shubb  
Trial Date: None set  
Action Filed: September 8, 2023

In accordance with Local Rule 144, Plaintiff X Corp. and Defendant Attorney General Rob Bonta, in his official capacity, hereby stipulate to extend Attorney General Bonta's time to file a response to Plaintiff's Complaint for Declaratory and Injunctive Relief, ECF No. 1 (Complaint), as follows:

1. Plaintiff filed the Complaint in this action on September 8, 2023, and served Defendant with the Summons and Complaint on September 11, 2023.

2. Attorney General Bonta's current deadline to file a response to the Complaint is October 2, 2023.

1           3.     The Complaint challenges the constitutionality of provisions of California Assembly  
2 Bill 587, 2021-2022 Reg. Sess. (Cal. 2022).

3           4.     Plaintiff intends to file a motion for preliminary injunction in this action no later than  
4 October 6, 2023.

5           5.     Attorney General Bonta intends to file a motion to dismiss the Complaint.

6           6.     The parties anticipate that the many of the issues in Plaintiff's motion for preliminary  
7 injunction and Defendant's motion to dismiss will substantially overlap.

8           7.     In order to streamline the Court's consideration of these issues, the parties wish to  
9 extend Defendant's deadline to respond to the Complaint until after Plaintiff's motion for  
10 preliminary injunction has been fully resolved.

11          8.     The parties therefore stipulate, and ask the Court to issue the parties' [Proposed]  
12 Order extending Defendant's time to respond to the Complaint as follows:

13           (a) If any party timely appeals this Court's order on Plaintiff's motion for preliminary  
14 injunction, Defendant's deadline to respond to the Complaint shall be 21 days after the Ninth  
15 Circuit issues its mandate in the appeal;

16           (b) If no party timely appeals this Court's order on Plaintiff's motion for preliminary  
17 injunction, Defendant's deadline to respond to the Complaint shall be 21 days after the expiration  
18 of the time period designated to file such an appeal.

1 Dated: September 27, 2023

Respectfully submitted,

2 ROB BONTA  
Attorney General of California  
3 ANTHONY R. HAKL  
Supervising Deputy Attorney General  
4 ANNA FERRARI  
Deputy Attorney General  
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6  
7 /s/ Signature  
GABRIELLE D. BOUTIN  
Deputy Attorney General  
8 *Defendant Attorney General Rob Bonta, in his official*  
9 *capacity*

10 Dated: September 27, 2023

CAHILL GORDON & REINDEL LLP

11  
12 /s/ Signature (as authorized on September 27, 2023)  
Joel Kurtzberg  
13 Floyd Abrams  
Jason Rozbruch  
14 Lisa J. Cole  
15 *Attorneys for Plaintiff X Corp.*  
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## CERTIFICATE OF SERVICE

Case Name: X Corp. v. Bonta

No. 2:23-CV-01939-WBS-AC

I hereby certify that on September 27, 2023, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**STIPULATION TO EXTEND TIME FOR DEFENDANT TO RESPOND TO COMPLAINT**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on September 27, 2023, at Sacramento, California.

Eileen A. Ennis

Declarant

/s/ Eileen A. Ennis

Signature